

## ETEXT ATTACHMENT

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October 18, 2002

Ms. Angel L. Williamson  
Senior Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: Clarification of Amended March Monthly Report (2/1/02 - 2/28/02) (I.D. Number C00282921)

Dear Ms. Williamson:

This letter responds to your RQ-5 letter dated August 9, 2002, which raised questions concerning the disclosure of limited payments for administrative expenses contained in the Winston & Strawn Political Action Committee ("Winston & Strawn PAC") (Identification Number: C00282921) Amended March Monthly Report.

In your letter, you stated that payments made for administrative expenses must be disclosed on Schedule B supporting Line 21(b) of the Detailed Summary Page. Each month the Winston & Strawn PAC reimburses the connected organization for administrative expenses including office space, utilities, telephone use, computer use, miscellaneous charges, and salaries for administrative personnel. This reimbursement is for a combined total of \$351.14 per month and is consistently reported on Line 21(b) on Winston & Strawn's PAC monthly reports, including the Amended March Monthly Report. Due to space constraints in the memorandum portion of the report, the reimbursements are listed as "administrative expenses" or "Bank Charges-Administrative expense for rent" rather than using a more complete notation. We apologize for any misunderstanding this may have caused, and we will work with our software vendor to provide a more detailed notation.

The Winston & Strawn PAC does not have a dedicated full-time administrative staff. Instead, administrative tasks are completed by secretarial staff of the connected organization. This staff member's salary is pro-rated to account for the amount of time spent on Winston & Strawn PAC matters. This calculation is included in the reimbursement paid by the Winston & Strawn PAC to the connected organization.

I hope this information addresses responsively the questions raised in your letter. If you require additional information or have further questions, please do not hesitate to contact me at (202) 371-5855.

nnnnnSincerely,

nnnnnWesley D. Bizzell, Esq.